

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
(CHATTANOOGA)**

IN RE:

**LECTRUS CORPORATION, et al.,
Debtors.**

**Jointly Administered Under
Case No. 1:17-bk-15588-NWW**

Chapter 11

**EX PARTE MOTION TO REDUCE TIME FOR NOTICE OF HEARING AND
OPPORTUNITY TO OBJECT TO DEBTORS' EXPEDITED MOTION TO EFFECT
CLARIFYING AMENDMENTS TO ORDER GRANTING MOTION TO ESTABLISH
BID AND SALE PROCEDURES & DEBTORS' EXPEDITED MOTION FOR
ADMINISTRATIVE CLAIMS BAR DATE**

The above-captioned debtors, Lectrus Corporation and Lectrus Holding Corporation (collectively, the "Debtors"), by and through their undersigned counsel and pursuant to Federal Rule of Bankruptcy Procedure 9006(c) and Local Rule 9013-1(g), move this Court to shorten the time for the Notice of Hearing and to shorten the opportunity for objections to *Debtors' Expedited Motion for Administrative Claims Bar Date* and *Debtors' Expedited Motion to Effect Clarifying Amendments to Order Granting Motion to Establish Bid and Sale Procedures* (collectively, the "Motions"). Debtors seek to have the Motions heard on March 1, 2018, which falls less than twenty-one (21) days after the filing of the Motions.

Rule 9006(c) of the Bankruptcy Rules provides that the Court "for cause shown may in its discretion with or without motion or notice order the period reduced." Rule 9006(c). As grounds for this motion, Debtors state that an expedited hearing on the Motions will assist the Debtors in providing for the timely and effective administration of this case, benefit all parties in interest in ascertaining the amount and nature of the various claims and interests prior to the

maturity of the Debtors' DIP facility, and increases the likelihood of generating higher bids for the Debtors' assets, and are thus in the best interests of the bankruptcy estates and their creditors.

WHEREFORE, Debtors request that the Court (a) shorten the time for the notice of hearing of the Motions, (b) shorten the time for objections to the filed to the Motions, and (c) allow the hearing on the Motions be set for March 1, 2018, at 10:30 a.m., in Courtroom A.

Dated: February 23, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of February, 2018, a copy of the foregoing electronically filed pleading was served on the parties listed on the attached creditor matrix and the office of the U.S. Trustee by first-class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party. Notice is also being sent to the below parties by first-class mail, postage prepaid.

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Suite 1700
Phoenix, AZ 85012-2761

Livingstone Partners, LLC
443 North Park Clark St.
Chicago, IL 60654

Lockwood Industries, Inc.
1100 Corporate Drive
Burlington, Ontario, Canada L7L 5R6
Burlington, ON

M2 Lease Funds LLC
Attn: Christine Kennedy, CFO
175 N. Patrick Blvd., Suite 140
Brookfield, WI 53045-5811

MD Dept. of Housing & Community Devel.
Division of Finance-Central Cashier
P.O. Box 2521
Landover Hills, MD 20784-0521

MTY Technologies
5806 S. Meadow Dr.
Pasadena, TX 77505-2322

Machale A. Miller
1515 Poydras Street
Suite 2130
New Orleans, LA 70112-3754

Machale A. Miller
Miller & Williamson, LLC
1515 Poydras St., #2130
New Orleans, LA 70112-3754

Majestic Steel USA, Inc.
NW 6118
P.O. Box 5161
Minneapolis, MN 55485-6118

March Adams & Associates, Inc.
P.O. Box 3689
Chattanooga, TN 37404-0689

Marco Specialty Steel, Inc.
P.O. Box 750518
Houston, TX 77275-0518

Mark Arms, VP Operations
1919 Polymer Dr.
Chattanooga, TN 37421-2204

Marlboro Manufacturing Inc
11750 Marlboro Ave NE
Alliance, OH 44601-9798

Marvair a Division of Airxcel, Inc.
P.O. Box 6407
Carol Stream, IL 60197-6407

Marvair, a division of Airxcel, Inc.
P.O. Box 400
Cordele, GA 31010-0400

Matheson TRI-GAS Inc.
P.O. Box 123028
Dept. 3028
Dallas, TX 75312-3028

Mayer Electric Supply Company, Inc.
P.O. Box 896537
Charlotte, NC 28289-6537

McCauley Lumber
626 Aldine Bender
Houston, TX 77060-4598

McMaster-Carr Supply Co.
P.O. Box 7690
Chicago, IL 60680-7690

McMaster-Carr Supply Company
1901 Riverside Parkway
Douglasville, GA 30135-3150

Meitec
2800 Veterans Memorial Blvd.
Metairie, LA 70002-6178

Miller Electrical Contractors
613 Shallowford Road
Chattanooga, TN 37411-1404

Mobile Mini, Inc.
P.O. Box 7144
Pasadena, CA 91109-7144

Mobile Modular Management
P.O. Box 45043
San Francisco, CA 94145-0043

Mobile Modular Management Corporation
4445 East Sam Houston Pkwy. So.
Pasadena, TX 77505-3912

Mobile Modular Management Corporation
c/o Niel Bansraj
5700 Las Positas Rd.
Livermore, CA 94551-7806

N.C.F.I.
P.O. Box 890616
Charlotte, NC 28289-0616

Nappco Fastener Company
7330 North Sam Houston Pkwy. West
Houston, TX 77064-3580

Net Star Internet
P.O. Box 301857
Dallas, TX 75303-1857

Nolan Power Group
P.O. Box 54986
New Orleans, LA 70154-4986

Northern Air Systems, Inc.
3605 Buffalo Road
Rochester, NY 14624-1120

Nova Healthcare TN, PLLC
P.O. Box 840138
Dallas, TX 75284-0138

O'Neal Steel, Inc. - Tennessee
P.O. Box 934243
Atlanta, GA 31193-4243

O'Neal Steel, Inc. - Texas
P.O. Box 934243
Atlanta, GA 31193-4243

Office Depot
P.O. Box 633301
Cincinnati, OH 45263-3301

Oglethorpe Power Corporation
2100 E. Exchange Place
Tucker, GA 30084-5336

Oil Service, Inc.
3498 Grand Avenue
Pittsburgh, PA 15225-1508

On Time Express, Inc.
733 W. 22nd St.
Tempe, AZ 85282-1905

PPG Industries, Inc.
19699 Progress Drive
Strongsville, OH 44149-3298

PPG Industries, Inc.
P.O. Box 534991
Atlanta, GA 30353-4991

Pacesetter
P.O. Box 684005
Houston, TX 77268-4005

Paul Bogard, VP Sales & Procurement

1919 Polymer Dr.

Chattanooga, TN 37421-2204

Peter E. Strenkowski

Main Document

600 Travis St., Ste. 1100

Houston, TX 77002-3030

Precision Products

P.O. Box 1119

Tunnel Hill, GA 30755-1119

Precision Scales, Inc.

5829 W. Sam Houston Pkwy. N, #205

Houston, TX 77041-5156

ProStar Services

P.O. Box 110209

Carrollton, TX 75011-0209

Product Identification, Inc.

P.O. Box 13157

Research Triangle Park, NC 27709-3157

Professional Plastics, Inc.

Dept. LA 23218

Pasadena, CA 91185-3218

Prominent Transport, LLC

Bibby Transportation Finance Inc.

P.O. Box 100920

Atlanta, GA 30384-0920

Providence Engineering &

Environmental Group, LLC

1201 Main Street

Baton Rouge, LA 70802-4658

RFE Management Corporation

c/o RFE Investment Partners

36 Grove St.

New Canaan, CT 06840-5329

RIS Insulation Supply

845 Greens Parkway, Suite 150

Houston, TX 77067-4460

RPM Expedite Inc.

100 Exchange Drive

Brampton, Ontario, Canada

L6S 0C8

RPM Expedite USA

100 Exchange Drive

Brampton, Ontario, Canada

L6S 0C8

Brampton, ON

Radiant Global Logistics

733 W. 22nd St.

Tempe, AZ 85282-1905

Ready Refresh

P.O. Box 856680

Louisville, KY 40285-6680

Reilly/Wesco

ABA 043000096

P.O. Box 676780

Dallas, TX 75267-6780

Rhonda Beard, VP Human Resources

1919 Polymer Dr.

Chattanooga, TN 37421-2204

Roxtec Inc.

1806 Solutions Center

Chicago, IL 60677-1008

Royal Cabling Techsus LLC

1918 Ridgewood Street

Houston, TX 77006-1729

SHRED-IT USA

28883 Network Place

Chicago, IL 60673-1288

STORE Master Funding VI, LLC

8377 E. Hartford Dr., Suite 100

Scottsdale, AZ 85255-5686

SULLIVAN-BROUGH INC

1121 E WALLACE

FORT WAYNE, IN 46803-2555

Safety RX Services & Supply Corp.

2835 E. Sam Houston Pkwy. S

Pasadena, TX 77503-4015

Safety Shoe Distributors, LLP

9330 Lawndale

Houston, TX 77012-2705

Safety-Kleen Systems, Inc.

P.O. Box 650509

Dallas, TX 75265-0509

Safetywear

Sullivan-Brough, Inc.

24117 Network Place

Chicago, IL 60673-1117

Sales Force

123 Mission

San Francisco, CA 94105-1681

Sam's Club Direct

P.O. Box 530930

Atlanta, GA 30353-0930

Samuel, Son & Company, Inc.

24784 Network Place

Chicago, IL 60673-1247

Sandler Training of Chattanooga

1200 Market Street

Old Freight Depot

Chattanooga, TN 37402-2713

Case 1:17-bk-15588-NWW
Schneider Electric USA, Inc.
1415 South Roselle Road
Palatine, IL 60067-7337

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Main Document Page 16 of 19
Schneider Electric USA, Inc.
152 Fairgrounds Road
West Kingston, RI 02892

Schneider Electric USA, Inc.
200 N. Martingale Road
Schaumburg, IL 60173-2026

Schneider Electric USA, Inc.
Tim Luksetich
3700 6th Street
Cedar Rapids, IA 52404-5403

(c)SCHWEITZER ENGINEERING LABORATORIES, INC.
ATTN: LEGAL DEPARTMENT
2440 NE HOPKINS CT
PULLMAN WA 99163-5616

Scott Machine Development Corporation
P.O. Box 88
Walton, NY 13856-0088

Service Partners
c/o Accounts Receivable
841 Great Southwest Parkway
Arlington, TX 76011-5428

Shred-It USA LLC
7734 S 133rd Street
Omaha, NE 68138-3499

Sierra Pacific Engineering & Products
4041 Via Oro Avenue
Long Beach, CA 90810-1458

Skelton Business Equipment
901 W. Main
Tomball, TX 77375-5591

South Atlantic LLC
P.O. Box 890425
Charlotte, NC 28289-0425

Southway Crane & Rigging-Atlanta, LLC d/b/a
c/o David A. Garland
Moore Clarke DuVall & Rodgers, P.C.
Post Office Drawer 71727
Albany, GA 31708-1727

Southway Crane & Rigging-Macon, LLC
222 New Dunbar Road
Byron, GA 31008-6337

Spray Pump Services, LLC
719 E. Pearce
La Porte, TX 77571

Stanley Convergent Security Solutions
Dept Ch 10651
Palatine, IL 60055-0001

State of New Hampshire
State Fire Marshall's Office
33 Hazen Drive
Concord, NH 03305-0011

Steel & Pipe Supply Co. Inc.
555 Poyntz Ave.
Manhattan, KS 66502-0126

Steel & Pipe Supply Company Inc.
P.O. Box 731266
Dallas, TX 75373-1266

Steffner Family Partnership
1724 Central Avenue
Chattanooga, TN 37408-2219

Steffner Family Partnership, L.P.
c/o Jimmy Steffner
1724 Central Avenue
Chattanooga, TN 37408-2219

Stericycle
P.O. Box 6582
Carol Stream, IL 60197-6582

Sterling Fire Protection, LLC
P.O. Box 470
Pearland, TX 77588-0470

Sterling First Aid & Safety Supply, Inc.
P.O. Box 2116
Pearland, TX 77588-2116

Steven Hudgins
Hudgins Law Firm
24 Greenway Plaza, Suite 2000
Houston, TX 77046-2444

Summit Electric Supply
P.O. Box 848345
Dallas, TX 75284-8345

Sun Coast Resources, Inc.
P.O. Box 202603
Dallas, TX 75320-2603

Sun Coast Resources, Inc.
c/o Mike Stoner
6405 Cavalcade St. Bldg. 1
Houston, TX 77026-4315

Sweetwater Valley Oil Co.
P.O. Box 537
Sweetwater, TN 37874-0537

T K Group, Inc.
Hearing Conservation Division
1781 S. Bell School Rd.
Cherry Valley, IL 61016-9338

T.R. Arnold & Associates, Inc.
4703 Chester Drive
Elkhart, IN 46516-9641

TB Philly, Inc.
400 Thomas Drive, Suite 411
Phoenixville, PA 19460-1199

TSL Energy Solutions
P.O. Box 705
Carmel, IN 46082-0705

Tabco Business Forms, Inc.
1100 S. State Road 46
Terre Haute, IN 47803-9314

Tennessee American Water
P. O. Box 578
Alton, IL 62002-0578

Tennessee Roofing and Construction, Inc.
8427 Hixson Pike
Hixson, TN 37343-1557

Tennessee Valley Authority
P.O. Box 1500
Knoxville, TN 37901

Texas Dept. of Licensing & Regulation
Licensing Division
P.O. Box 12157
Austin, TX 78711-2157

Texas Towel & Supply, Inc.
P.O. Box 15128
Houston, TX 77220-5128

The Ultimate Software Group, Inc.
c/o Robert Manne
1455 North Park Drive
Weston, FL 33326-3215

Thermal Resource Sales, Inc.
P.O. Box 667
Kernersville, NC 27285-0667

Thrifty Car Rental-Commercial Billing
14501 Hertz Quail Springs Pkwy
Oklahoma City, OK 73134-2628

Thyssen Krupp Steel Services
Woodstock, AL)
P.O. Box 2625
Carol Stream, IL 60132-2625

Tri-State Electrical Contractors, Inc.
4701 Wilson Road
Building A
Chattanooga, TN 37410-2140

Trumpf, Inc.
Dept. 135
P.O. Box 150473
Hartford, CT 06115-0473

Turtle & Hughes
1900 Lower Road
Linden, NJ 07036-6586

Twelco, Inc.
15411 Treichel Road
Tomball, TX 77377-6138

U.S. Postal Service
GMF Window Service
Chattanooga, TN 37422-2147

UPS
P.O. Box 577
Carol Stream, IL 60132-0577

Uline
P.O. Box 88741
Chicago, IL 60680-1741

Ultimate Software Group, Inc.
P.O. Box 930953
Atlanta, GA 31193-0953

Ultimate Software Group, Inc. (UltiPro)
2000 Ultimate Way
Weston, FL 33326-3643

United Enertech
3005 S. Hickory Street
Chattanooga, TN 37407-1425

United Power and Control Systems, LLC
P.O. Box 446
Spring, TX 77383-0446

United Rentals (North America)
P.O. Box 100711
Atlanta, GA 30384-0711

United States Trustee
Historic U.S. Courthouse
31 E. Eleventh Street
Fourth Floor
Chattanooga, TN 37402-4205

Valmont Structures
3575 25th Street SE
Salem, OR 97302-1123

VisionMark Nameplate Company, LLC
P.O. Box 280
New Knoxville, OH 45871-0280

Voltech Electrical, LLC
P.O. Box 2833
Spring, TX 77383-2833

W.J. O'Neil Company
P.O. Box 2006
Chattanooga, TN 37409-0006

WCA Waste Corporation
P.O. Box 553166
Detroit, MI 48255-3166

Walker Interiors LLC
2906 8th Avenue
Chattanooga, TN 37407-1543

Attn: Aaron Rud
8515 Highway 6 South
Houston, TX 77083-5710

Waste Services of Tennessee
P.O. Box 180600
Chattanooga, TN 37406-7600

Weiser Security
P.O. Box 51720
New Orleans, LA 70151-1720

Wells Fargo Vendor Fin. Services
P.O. Box 105710
Atlanta, GA 30348-5710

Wells Fargo Vendor Financial Svcs., LLC
1961 Hurst Drive
Moberly, MO 65270-3046

Wex Bank
P.O. Box 5727
Carol Stream, IL 60197-5727

Whitfield Oil Company
Alice Womack, Customer Relations
PO Box 155
Chickamauga, GA 30707-0155

Whitfield Oil Company
Attn: Credit Dept
222 Industrial Dr.
P.O. Box 155
Chickamauga, GA 30707-0155

Wholesale Electric Supply
Company of Houston
P.O. Box 732778
Dallas, TX 75373-2778

Willis Insurance Services of Georgia
29727 Network Place
Chicago, IL 60673-1297

Wood Alternator and Starter
680 Aldine Mail Route
Houston, TX 77037-1748

Xerox Capital
P.O. Box 802555
Chicago, IL 60680-2555

YRC
P.O. Box 730375
Dallas, TX 75373-0375

Yale Carolinas, Inc.
dba Wheeler Material Handling
9839 S. Tryon Street
Charlotte, NC 28273-6505

m2 Lease Funds, LLC
c/o Russell S. Long
Davis & Kuelthau, s.c.
111 East Kilbourn Avenue, Ste. 1400
Milwaukee, WI 53202-6613

Joseph Greenwood
Livingstone Partners, LLC
443 N. Clark Street
Chicago, IL 60654-4540

Shaun Martin
Winter Harbor, LLC
265 Franklin Street, 10th Floor
Boston, MA 02110-3113

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

TXU Energy
P.O. Box 650638
Dallas, TX 75265-0638

Addresses marked (c) above for the following entity/entities were corrected
as required by the USPS Locatable Address Conversion System (LACS).

Case 1:17-bk-15588-NWW
Schweitzer Engineering Laboratories, Inc.
Attn: Legal Department
2350 NE Hopkins Court
Pullman, CA 99163

(d)Jason D. Kraus
The Kraus Law Firm
5625 Cypress Creek Parkway, Ste. 308
Houston, TX 77069-4210

(d)Johnson Construction Specialties Inc.
P.O. Box 1360
Houston, TX 77251-1360

(d)Marlboro Manufacturing, Inc.
11750 Marlboro Avenue NE
Alliance, OH 44601-9798

End of Label Matrix
Mailable recipients 320
Bypassed recipients 12
Total 332